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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Amanda Davis, individually  
and on behalf of all others similarly situated,

Plaintiff,

v.

American Education Services LLC; KeyCorp  
Financial, Inc. dba KeyBank

Defendants.

Case No.: 2:22-cv-01645-JAD-EJY

STIPULATION AS TO KEYBANK  
NATIONAL ASSOCIATION RE: TIME  
TO FILE RESPONSIVE PLEADING

Plaintiff, Amanda Davis, and KeyBank National Association (“KeyBank N.A.”), by and through their undersigned counsel, hereby request court approval of the following stipulation.

Plaintiff filed her Complaint on September 28, 2022. [ECF No. 1]. KeyBank N.A. received service of the Complaint on October 6, 2022. The Complaint identifies “KeyCorp Financial, Inc.” as a defendant. The deadline for “KeyCorp Financial, Inc.” to file a responsive pleading to Plaintiff’s Complaint is October 27, 2022. [ECF No. 5].

KeyBank N.A. has informed Plaintiff's counsel that it has no known affiliation with "KeyCorp Financial, Inc." Counsel for Plaintiff has indicated that it requires time to investigate whether the Complaint must be corrected, which may include an amendment to add KeyBank N.A. as a defendant.

WHEREAS, the Plaintiff and KeyBank N.A. hereby stipulate and agree as follows:

1. The October 27, 2022 deadline to file a responsive pleading is inapplicable to KeyBank N.A. and its known affiliates.
2. Plaintiff shall have thirty (30) days to amend the Complaint or otherwise add KeyBank N.A. or any known KeyBank N.A. affiliate as a defendant, and to provide notice of the same to KeyBank N.A.
3. In the event Plaintiff names KeyBank N.A. or any known KeyBank N.A. affiliate as a defendant in this case and provides notice, KeyBank N.A. shall waive service of the summons and, as permitted by Rule 4 of the Federal Rules of Civil Procedure, shall file a responsive pleading within sixty (60) days.

DATED: October 27, 2022

BENNETT TUELLER JOHNSON & DEERE

FREEDOM LAW FIRM

/s/ Jared Inouye

/s/ George Haines

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IT IS SO ORDERED:

  
U.S. MAGISTRATE JUDGE